

EXHIBIT 2

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

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In Re:) Case No. 4:23-Bk-40523
) Chapter 11
THE ROMAN CATHOLIC BISHOP OF)
OAKLAND) Oakland, California
) Friday, December 1, 2023
Debtor.) 9:00 AM

MOTION FOR ENTRY OF AN ORDER
PERMITTING INSURER EXPERTS
AND/OR CONSULTANTS TO HAVE
ACCESS TO SEXUAL ABUSE PROOFS
OF CLAIMS AND SUPPLEMENTS

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE WILLIAM J. LAFFERTY
UNITED STATES BANKRUPTCY JUDGE

APPEARANCES (All present by video or telephone):

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For the Committee: GABRIELLE L. ALBERT, ESQ.
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Also Present: Bradley Puklin
London Market Insurers

1 Also Present (cont'd): Clinton Cameron
2 London Market Insurers
3 Tancred Schiavoni
4 Pacific Indemnity and PIC
5 Mark Plevin
6 Continental Casualty Company
7 Blaise Curet
8 Westport Insurance Corporation
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25 Proceedings recorded by electronic sound recording;
transcript provided by transcription service.

The Roman Catholic Bishop Of Oakland

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1 OAKLAND, CALIFORNIA, FRIDAY, DECEMBER 1, 2023, 9:00 AM

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3 (Call to order of the Court.)

4 THE CLERK: Good morning. Please come to attention.
5 The Court is in session. This is the United States Bankruptcy
6 Court, Northern District, California. The Honorable William J.
7 Lafferty presiding.

8 THE COURT: Okay. This is Judge Lafferty, and this is
9 a matter that I especially requested some appearances for, so
10 let's go ahead and call that matter.

11 THE CLERK: Yes, Your Honor. Calling line item number
12 1 for the Roman Catholic Bishop of Oakland, case number 23-
13 34052. The parties are being moved over now, Your Honor.

14 THE COURT: Okay.

15 (Pause.)

16 THE COURT: Okay. So I have nine folks on the screen.
17 Are there more?

18 THE CLERK: These are the parties who accepted the
19 invite to be moved over, Your Honor.

20 THE COURT: Okay. Let's have appearances, please.
21 Why don't we start with the debtor's representatives?

22 MR. LEE: Morning, Your Honor. Matt Lee of Foley and
23 Lardner, appearing for the debtor.

24 THE COURT: Okay. Good morning.

25 MS. RIDLEY: Good morning, Your Honor. Eileen Ridley

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1 appearing for the debtor, specifically regarding the adversary
2 proceeding as well.

3 THE COURT: Okay. Let me hear from the committee's
4 representatives.

5 MS. ALBERT: Your Honor, Gabrielle Albert, local
6 counsel for the committee.

7 THE COURT: Okay. Anybody else for the committee?

8 MS. RESTEL: Good morning, Your Honor. Colleen
9 Restel, Lowenstein Sandler, on behalf of the committee.

10 THE COURT: Okay. Great. Okay. I assume the rest of
11 the appearances are insurance company folks. Why don't we go
12 ahead and take the roll call there, please? Okay.

13 MR. PUKLIN: Good morning, Your Honor. Brad Puklin
14 and Clinton Cameron for London Market Insurers.

15 THE COURT: Okay. I don't think I heard Mr.
16 Schiavoni. I think he might have been muted.

17 MR. SCHIAVONI: Sorry, Your Honor. Tancred Schiavoni
18 for --

19 THE COURT: Schiavoni. I'm sorry.

20 MR. SCHIAVONI: -- for Pacific Indemnity --

21 THE COURT: I always do that to you. Thank you.

22 MR. SCHIAVONI: That's fine, Your Honor. Pacific
23 Indemnity and PIC.

24 THE COURT: Okay.

25 MR. PLEVIN: Good morning, Your Honor. This is Mark

1 Plevin for Continental Casualty Company.

2 THE COURT: Okay.

3 MR. CURET: Good morning, Your Honor. Blaise Curet
4 for Westport Insurance Corporation.

5 THE COURT: Okay. That's everybody, I think. Yes,
6 correct?

7 THE CLERK: Yes, Your Honor.

8 THE COURT: Okay. Well, first of all, thanks to all
9 of you for making yourselves available on a Friday morning. I
10 hope you all had a nice Thanksgiving.

11 Not long after I adjourned the hearing on the issue of
12 the ability of the insurance companies, experts and/or
13 professionals to review claims information, it occurred to me
14 that I had elided over something that I shouldn't have. And
15 maybe it's a nonissue or maybe it's exactly what we're arguing
16 about. I'm not sure.

17 So let me just pose the question to either the
18 committee/debtor and/or the insurance companies. Is the issue
19 here whether any information may be shared with the insurance
20 companies, experts/professionals, or whether it's just PII?

21 MS. RESTEL: Good morning, Your Honor. Colleen Restel
22 on behalf of the committee. The issue is we have no -- I mean,
23 we have no basis to object to any information that's publicly
24 available being shared. It's really the proof of claim forms
25 themselves that can make --

1 THE COURT: Well, let me -- can I stop you there? I
2 mean, in my mind, and you're going to correct me if you think
3 I'm wrong, okay, in my mind, there's a lot of difference
4 between something that could be extracted from a proof of claim
5 form that would tend to show a pattern or would tend to show a
6 tendency or an argument that might be supported by the facts
7 that would be culled from different ways of looking at the
8 information on the claim form, and who the claimant is. Those
9 are two, in my mind, very different questions.

10 I'm having a hard time understanding why the first
11 category couldn't and shouldn't be shared with not just the
12 insurance companies but also their experts. If their experts
13 are going to be asked to extrapolate and make other arguments
14 based on what is or isn't in the claim forms, putting aside the
15 PII for a second, so do you have a -- I'd like your reaction to
16 that.

17 MS. RESTEL: Sure. I think the distinction there is
18 that the committee doesn't have any opposition to the
19 experts -- the insurers having experts and the claims and all
20 the information being shared. It's just a matter of the notice
21 and the disclosure to the claimants of who is receiving that
22 information.

23 THE COURT: Well, again, my same question. Well, let
24 me phrase it slightly differently. Is there a reason why a
25 claimant would care that something in their claim that could

1 not be tied to them personally were shared with an expert so
2 that the expert could assist the insurance companies in making
3 arguments about the correct amount of a claim or a matrix or
4 whatever it is you want to say. Is there a reason why, if that
5 individual is not identified, that that individual could or
6 should care about that?

7 MS. RESTEL: I think the distinction there is
8 determining what information is personally sensitive .

9 THE COURT: Yeah.

10 MS. RESTEL: If we're going to --

11 THE COURT: No, I hear you. I hear you. I mean, the
12 person --

13 MS. RESTEL: We're talking about the --

14 THE COURT: I mean, look, the person -- I mean, we'll
15 get to this in a second. The person's name, I'm not sure why
16 the experts need to know that right away; although, they may
17 have arguments that there are some fraud issues that we might
18 be getting to down the road. And I'm happy to hear about
19 those. I'm not sure we're there yet.

20 But something like, for example, maybe the year of
21 birth, without the actual date of birth, would be relevant
22 because maybe one would look at a damage issue differently if
23 the victim were fourteen than if the victim were twenty, for
24 example. I mean, that's kind of the level at which I'm trying
25 to parse this.

1 Now, is there another reason why putting aside
2 something that would link the information, and I deeply believe
3 and agree with you this is traumatic, it's traumatic whether it
4 happened yesterday or thirty years ago, it doesn't matter, it's
5 traumatic, but if we can shield the identity of the person from
6 the rest of the information subject to the insurance companies
7 telling me at some point they may need that as well to do some
8 sort of fraud check or something along those lines or double
9 counting check or whatever you want to call it. Putting that
10 aside for a second, is there a reason why the rest of the
11 information couldn't and shouldn't be shared so their experts
12 can do what experts do, which is extrapolate from a big bunch
13 of information down to patterns and arguments and tendencies
14 and numbers?

15 MS. RESTEL: Sure. I think the difference is
16 something like the year of birth or where the abuse occurred.
17 I think that that's something that definitely, as long as that
18 couldn't be tied back to the claimant, I don't think that
19 that's what the issue is. I think it more goes to the
20 narrative of the abuse that occurred that a claimant may not
21 want -- they may just want to know the universe of who that's
22 shared with.

23 THE COURT: Well, again, if it isn't tied back to them
24 individually, what is the -- what's the concern or what's the
25 due process issue if it's not -- if one could not otherwise

1 say, okay, that happened to John Doe.

2 MS. RESTEL: Well, I think that the issue is if you
3 look at the proofs of claims, some of the descriptions of the
4 abuse are very detailed, and sometimes, the description of the
5 abuse (audio interference) necessarily narrow the number of
6 people it could be.

7 THE COURT: Okay. Okay. Okay. All right. Does
8 anybody else want to speak to this from the debtor/committee
9 side of things before I turn to the insurance companies and ask
10 them a couple of questions?

11 MR. LEE: Not for the debtor, Your Honor.

12 THE COURT: Okay. Thank you very much, and by the
13 way, thank you, Ms. Restel. That was extremely helpful. I
14 appreciate it.

15 Let me turn to the insurance companies and ask, well,
16 you see where I'm going with this, right? I mean, I can see
17 why it would be very helpful to professional/experts to have
18 information from which they can extract the data that they need
19 to have to do what they're going to do, which is to offer
20 opinions about things like valuations or matrices or whatever
21 else you want to call it, without necessarily, at the moment,
22 having to know what's the name of the person associated with
23 this event.

24 So if I were to carve this that way for now, is that
25 helpful, or do you have another thought about this?

1 MR. SCHIAVONI: So Your Honor, this is Tanc Schiavoni
2 from O'Melveny. If I can just sort of, like, just put this in
3 context. I mean, our clients handle personal injury actions
4 all the time, many of which involve all kinds, like putting
5 aside sexual abuse, involve all kinds of sensitive information,
6 medical subject to HIPAA, and other sorts of things. And you
7 know, we're sensitive to how this material is handled. We have
8 a huge self-interest for various reasons to be very careful
9 about not sharing it willy nilly, not sharing unless it's
10 really absolutely necessary with experts.

11 So there are some experts we would use to do things,
12 say, for instance, like an allocation of claim periods. Okay?
13 I don't need to give that person the narrative data in the so-
14 called proofs of claim. I don't need to do that. But it is an
15 important issue here about sort of who these people are.

16 I have a claim in a Diocese in New York case where the
17 person has made serial claims, which was the subject of
18 argument just last week in Syracuse, the subject of serial
19 allegations in other cases and before the Social Security
20 Administration, where they found that the person had made
21 fraudulent claims, et cetera, et cetera. All right.

22 So we need some ability to provide the names of the
23 people to the expert in the right circumstances.

24 THE COURT: But wait a minute. Let me ask you a
25 question. Why is that the expert's job, I mean, if you happen

1 to know somebody's filed a claim. You, Mr. Schiavoni, who are
2 a leading insurance company litigator on these issues, why does
3 your expert have to know the claim for you to match them up
4 with something that you think is troubling in another case or
5 duplicative of another case?

6 MR. SCHIAVONI: Your Honor, I'm a partner, a lawyer at
7 O'Melveny.

8 THE COURT: Yeah.

9 MR. SCHIAVONI: I do not investigate individual claims
10 as a general matter. It's not my skill set, so to speak, in
11 some instances. I will say, in that particular case, we were
12 the ones to run the search of the Social Security
13 Administration, but other things we did, in Boy Scouts, there
14 were handwriting experts that looked at and found literally
15 forged proofs of claim, hundreds of them (audio interference).

16 THE COURT: Okay. Well, but yeah, there were also
17 80,000 claims. There were also 80,000 claims in that case, and
18 we're talking about a different universe here.

19 MR. SCHIAVONI: I hear, Your Honor.

20 THE COURT: Okay.

21 MR. SCHIAVONI: But also just to understand this,
22 okay, we submitted an affidavit in connection with this that
23 shows that almost half or more of the claimants publicly filed
24 their complaints with their names in the complaints, who they
25 alleged the abuser was, and some description of the abuse.

1 In the tort system, there is not anonymity preventing
2 the parties from exercising their rights under the Federal
3 Rules and the Rules of California practice to use experts.
4 There just isn't. It's like the experts have to sign
5 confidentiality agreements and be careful. But you're not --
6 one isn't prohibited. It's like that's just not what happens
7 in the tort system. And in fact, they're publicly filing the
8 complaints. That's what the affidavit says.

9 So we have a huge interest in exercising due care and
10 being cautious, but putting burdens on us from just doing basic
11 investigations if we need to. And you know, candidly, the
12 other thing that did come out in Boy Scouts, when the trustee
13 assumed the role she now has, and she's appointed with the
14 consent of the claimants, she recently applied and got approval
15 for antifraud protections to be put in place. She asked for
16 confidentiality on specifically exactly what she was doing to
17 check and confirm the claims, and that was granted by Judge
18 Christine.

19 So to put us in the position of having to disclose
20 exactly who we're using and when we're using them, it's not
21 contemplated by the Federal Rules or by state practice. For
22 instance, like just to give you an example here, it's like if
23 we were to -- if I were to decide, look, maybe now is the time
24 to use a jury consultant. Normally, I would not disclose that
25 to my adversary. I'm not suggesting I want to disclose

1 necessarily proofs of claim to a jury consultant, but I
2 wouldn't necessarily go to my adversary and say, oh, let me
3 tell you, now is the time we've selected to use a jury
4 consultant, and here's who it is. It's invasive to just the
5 basic process here.

6 We would want to be extremely careful here about how
7 we're handling things, but half the claimant's names are
8 already in the public system. It's like they're in Docket
9 Search if you just look for them there. Is that responsive to
10 your question, Your Honor? I think (audio interference).

11 THE COURT: No. Partly. But as usual, like a good
12 lawyer, you're trying to steer me in a different direction. I
13 appreciate that. You're really good at that. Partly, it is.

14 MR. SCHIAVONI: I got carried away, I think, is what I
15 did.

16 THE COURT: No, no, that's fine. I mean, it's fine.
17 I always learn something. Okay. That's fine.

18 Does anybody else want to be heard? I have some
19 further thoughts, but before I express them, why don't I invite
20 anybody else who wants to be heard on the subject? Nobody?
21 Okay.

22 Well, here's my inclination. My inclination is to say
23 that we can talk for a moment about what is PII here, and look,
24 I hear a lot of what Mr. Schiavoni is saying. I'm sure they
25 take very seriously their confidentiality obligations, and I'm

1 sure anybody they hire would because they'd be well-advised by
2 O'Melveny to do so. I have no doubt of that at all.

3 I also realize that there's some level of nonanonymity
4 here if people have been filing things in a state court tort
5 system. That's arguably a little bit different from what we
6 ask people to do in a proof of claim form, arguably. I don't
7 necessarily take it that that ethic should hold when we're
8 talking about proofs of claim that we have asked people to file
9 here that have a fair amount of data and a fair amount of
10 narrative that might be very difficult for somebody to put to
11 paper in the first place. It might be even more difficult for
12 them to know it's being shared with others.

13 But to me, the linchpin of all this is, are we at a
14 place now where I can say that an expert, or other
15 professional, other than the people already covered by the Bar
16 Date Order, needs to know the personal identifying information
17 of a claimant. And to me, the answer right now is no.

18 There may come a time when that's more important
19 because we've drilled down to something that is much more
20 definable as a problem where that information is going to have
21 to be disclosed to experts because the experts are doing
22 something very particular to determine what's the right
23 universe there, and is there overlap, is there fraud, is there
24 duplication?

25 What I do think we should have right now is some

1 protocol that allows the basic information outside of the PII,
2 but for the year of birth to be shared by the insurance
3 companies with their experts/professionals. To the extent that
4 they want to tell me later, there's a reason why we need to get
5 into the PII as well for them to perform some other function
6 that I don't think is really materially in front of us right
7 now, I'm happy to hear that, but I'm not hearing it right now.

8 So that's my direction here. Anybody want to divert
9 me or suggest something else?

10 MR. SCHIAVONI: Your Honor, can I first -- Tanc
11 Schiavoni again. Can I just ask you a question?

12 THE COURT: Yeah.

13 MR. SCHIAVONI: What do you -- I apologize for this,
14 but I'm not quite sure what you're referring to as PII.

15 THE COURT: Well, I mean, for example, if there's --
16 there was -- in the Bar Date Order, if I remember correctly,
17 there was a notion that some -- there was going to be some way
18 to identify a claim without identifying a claimant, so these
19 things are keyed in some way.

20 As far as I'm concerned, if that can be replicated
21 with the experts so that, for example, the name of the claimant
22 or maybe the address of the claimant or something else that
23 might reasonably identify the claimant as that person could be
24 shielded from the experts and professionals, then I think the
25 other information I think is relevant to what experts do. What

1 kind of a claim is this? How old was the claimant? What are
2 the circumstances? How often did it happen? I think that's
3 all something that an expert is going to need to look at to be
4 able to advise the insurance companies about their responses to
5 things like matrices and the other things that go into the way
6 one resolves these issues. So is that helpful?

7 MR. SCHIAVONI: Yeah, I understand. Thank you, Your
8 Honor. I understand. (Audio interference).

9 THE COURT: All right. Is anybody else -- no, Mr.
10 Schiavoni, you go ahead. I keep cutting you off.

11 MR. SCHIAVONI: I'm sorry. That leaves us with the
12 ability to sort of basically review the proof of claim to
13 determine what is asserted there.

14 THE COURT: Yeah.

15 MR. SCHIAVONI: But Your Honor, if you remember, it's
16 like the proofs of claim are not even signed. I think we're
17 going to find when we get them, they're not even signed by the
18 claimants. They're signed by lawyers. So it's like getting
19 complaints without the names on them. We're not able to
20 investigate independently what it's -- like, in other words,
21 we're left with having to take in the complaint as fact,
22 instead of investigate separately whether it's like actually
23 reality, so to speak.

24 THE COURT: But I guess my question is, to what extent
25 are the experts going to help you with that? That's not

1 what -- that's just not clear to me right now.

2 MR. SCHIAVONI: Okay. So I'll tell you some things,
3 but the more you push us, the more basically sort of we have to
4 get into work product, but (audio interference).

5 THE COURT: Well, all right, then, I'll tell you what,
6 then don't do that. Take my ruling for today and I'm reserving
7 the idea if you need -- if you come back and tell me, well,
8 look, the experts at this stage are specifically going to need
9 more information than they have now, you can tell me that, and
10 the committee can respond, and we can see what we do about
11 giving notice to the claimants or anything else.

12 But for today's purposes, I think that the basic
13 information in the proof of claim form should be shared, should
14 be shareable, by the insurance companies with their experts
15 without getting into what I'll call personal identifying
16 information. Okay?

17 MR. SCHIAVONI: Your Honor, may I ask this? May we,
18 at least, match for the experts for those claimants for whom we
19 have publicly filed complaints, can we match those names to the
20 to the POCs? I mean, we can take them with redactions, but
21 we're able to --

22 THE COURT: I can imagine why that might strike the
23 committee as problematic, so let me throw that to the
24 committee.

25 MS. RESTEL: Sure. Again, Your Honor, the committee

1 doesn't have any issue with the publicly filed proofs of
2 claim -- publicly filed complaints being shared, but it's a
3 matter of matching it with the complaint and putting those
4 pieces together. Suddenly, some of that PII may be shared or
5 more information may be shared, and we just don't see the need
6 for that at this time.

7 THE COURT: Well, let me resolve it this way. Okay?
8 I will leave that an open issue. Okay? I will let Mr.
9 Schiavoni or others tell me that, no, we need to do that match
10 up. And at that point, I mean, the difference is we're
11 arguably asking for different information for arguably
12 different reasons and arguably at greater levels of detail
13 depending on whether we're in a complaint or whether we're in a
14 proof of claim form with a supplement.

15 At that point, Ms. Restel, it's going to be up to you
16 to convince me that those differences are significant enough
17 that it matters, that I shouldn't let Mr. Schiavoni match those
18 up. Okay? Because I think that's going to be the issue. I
19 mean, he may well be right that, look, it's public, and you may
20 say, well, it's public, but there's something about the
21 matching that's problematic because we're asking for something
22 more, something different, something more embarrassing,
23 something more traumatic in the proof of claim form.

24 You can make that argument, and I'll decide it on that
25 basis. Okay? Makes sense?

1 MS. RESTEL: Understood, Your Honor.

2 THE COURT: All right. Thank you very much. So to
3 this extent, I am granting the insurance companies motion to
4 the extent I'm suggesting today, that I think that information,
5 other than what I'm loosely calling PII, should be shareable
6 with the insurance companies, experts/professionals. And I
7 will reserve for another day the question of whether other
8 information, including this matching information, should be
9 available to the experts.

10 And I'll let Mr. Schiavoni and others make that
11 argument when it's appropriate to do so. I'll let the
12 committee respond in the way I've suggested and possibly other
13 ways as well. All right?

14 Okay. Thank you very much, everybody. And I'll see
15 you guys on the 19th, right? Okay. Thank you.

16 THE CLERK: Your Honor, Mr. Plevin has his hand up.

17 THE COURT: I'm sorry. Somebody has their hand up?
18 Yeah.

19 MR. PLEVIN: Your Honor, Mark Plevin for Continental.
20 I had a question that perhaps the committee or the debtor could
21 answer.

22 THE COURT: Sure.

23 MR. PLEVIN: And I ask this question because I'm
24 confused in my mind as to the different proof of claim forms
25 and different cases and the drafts that we had that were

1 accepted in part and not accepted in part. But at least some
2 of these cases or drafts being negotiated among the cases,
3 there's a checkbox for a claimant to say whether they want to
4 maintain anonymity because some claimants don't. Some
5 claimants are happy to have their information public. I mean,
6 we've seen in other cases news conferences where claimants
7 provide information about their claims.

8 And it would seem to me that if we have that feature
9 on these proofs of claim and if a claimant has indicated
10 through a checkbox that they don't want to maintain anonymity,
11 that that information should not be subject to the restrictions
12 that you've just ordered.

13 THE COURT: You may be right. So let me turn that to
14 the committee, and then, depending on their answer, I've got
15 another thought. Okay?

16 MS. RESTEL: Thank you, Your Honor. I think I would
17 need to go back. As Mr. Plevin said, all of these proof of
18 claim forms are a little different. I would need to take a
19 minute to pull it up to see if that checkbox is there.

20 THE COURT: Yeah.

21 MS. RESTEL: I don't recall it being there, and I
22 recall there being specific language that proofs of claim are
23 all confidential. But again, I don't want to misspeak, and I
24 would have to go back and look.

25 THE COURT: Well, I think that's a fair response. And

1 when you do so, I know what I'll be doing, I'll be looking at
2 the claim Bar Date Order to see if there's anything in there
3 that might have made it somewhat ambiguous what the effect of
4 checking that box would be. I don't remember that either, but
5 that will be the direction I'll be going.

6 So if you wouldn't mind checking that and having a
7 conversation with Mr. Plevin, and if that's clarifiable in the
8 order that Mr. Schiavoni and Mr. Plevin, I suggest, you're
9 going to be drafting, then that's fine. Okay?

10 MS. RESTEL: No problem, Your Honor.

11 THE CLERK: Your Honor, Mr. Schiavoni also
12 disconnected.

13 THE COURT: Mr. Schiavoni might have dropped off. Was
14 that --

15 THE CLERK: Yes, Your Honor. Yes, Your Honor.

16 THE COURT: Do we know if that was --

17 THE CLERK: I believe Mr. Schiavoni thought the
18 hearing had concluded.

19 THE COURT: Well, Mr. Schiavoni has left us. Did
20 you --

21 MR. PLEVIN: I will talk to him, Your Honor. Do you
22 want him to draft the order?

23 THE COURT: Yeah. It can be for the reasons stated on
24 the record. If he needs me to do it because he wants me to
25 articulate something I said, he can let me know. But I think

1 that, as usual, we have a fairly broad discussion of these
2 things when I have the privilege of having all of you in front
3 of me. So for me, for the reasons stated on the record is
4 usually sufficient. Okay?

5 MR. PLEVIN: Yeah, I will talk to him, Your Honor.

6 THE COURT: All right. Thank you very much.

7 MR. PLEVIN: Thank you, Your Honor.

8 THE COURT: Thank you.

9 MR. PLEVIN: Bye-bye.

10 THE COURT: See you guys in two weeks.

11 (Whereupon these proceedings were concluded at 9:25 AM)

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I N D E X

RULINGS:	PAGE	LINE
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C E R T I F I C A T I O N

I, Jocelyn Finocchiaro, certify that the foregoing transcript
is a true and accurate record of the proceedings.



/s/ JOCELYN FINOCCHIARO, CDLT-304

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Date: December 9, 2023

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